

February 2, 2005 Workshop/Board Meeting

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Tri-TAC

Jointly Sponsored by:

League of California Cities

California Association of Sanitation Agencies

California Water Environment Association

Reply to:

Sharon N. Green, Chair

Tri-TAC

c/o Sanitation Districts of Los Angeles County

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January 25, 2005

Via U.S. and Electronic Mail

Arthur G. Baggett, Jr., Chair and Members

State Water Resources Control Board

P.O. Box 100

Sacramento, CA 95814

ATTN: Debbie Irvin, Clerk to the Board

dirvin@waterboards.ca.gov

Dear Chairman Baggett and Members:

**Comments on the Draft FED dated December 2004 for Proposed Revisions
to the Statewide Implementation Policy for Toxics – SWRCB Public Hearing
February 2, 2005, Agenda Item No. 4**

On behalf of Tri-TAC and the California Association of Sanitation Agencies (CASA), I am submitting these comments regarding the draft Functional Equivalent Document (FED) for the proposed revisions to the Policy for the Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays and Estuaries of California (SIP) currently being developed by the SWRCB. CASA and Tri-TAC are statewide organizations comprised of members from public agencies and other professionals responsible for wastewater treatment. Tri-TAC is jointly sponsored by CASA, the California Water Environment Association and the League of California Cities. The constituency base for CASA and Tri-TAC collects, treats and reclaims more than two billion gallons of wastewater each day and serves most of the sewered population of California.

We previously submitted comments on the scope of the FED on November 12, 2004, which are attached and incorporated herein by reference (see Attachment 1). Based on our review of the draft FED and various EPA documents, such as the California Toxics Rule (CTR), National Toxics Rule (NTR), and EPA's guidance on water effect ratios (WERs), we offer the following comments regarding Revisions to Section 1.2 and 1.3 of the SIP for your consideration.